

GUHA PLLCSAMIDH GUHA  
212-399-8350 PHONE  
sguha@guhapllc.com EMAIL

August 30, 2023

VIA ECF

The Honorable Ona T. Wang  
United States District Court  
Southern District of New York  
Daniel Patrick Moynihan United States Courthouse  
500 Pearl Street, Courtroom 20D  
New York, New York 10007

**Re: *Secure Source Claims Company, LLC, as assignee of 125 CHP, LLC v. Miller et al.***  
**Case No. 22 Civ. 9764 (GHW) (OTW)**  
**Consent Request for Adjournment of Status Conference**

Dear Magistrate Judge Wang:

We serve as counsel for Defendants Edward F. Miller, USDG, LLC, Michael Piumelli, Giovanna Battaglia, Margaret Miller, Segovia Construction LLC, Jose Segovia, and Samantha Bustamante (the “Miller Defendants”).

Due to a personal scheduling conflict, we respectfully request a brief adjournment of the status conference currently scheduled for Wednesday, July 6, 2023 at 2:00 PM in 500 Pearl Street, Courtroom 20D, New York, NY 10007 (ECF No. 96). We have conferred with the Plaintiff and the other Defendants, who consent to this request.

This is the Miller Defendants’ first request for an adjournment of a status conference, and the second request for any adjournment or extension of time. The Miller Defendants previously requested an extension of time to respond to Plaintiff’s First Amended Complaint, which was granted by Your Honor (ECF No. 96).

Per Section I(e) of Your Honor’s Individual Practices in Civil Cases, we have discussed alternate dates with the Plaintiff and the other Defendants. All parties are available on Tuesday, September 12, 2023 and Wednesday, September 20, 2023, should either of these dates be convenient for Your Honor.

Thank you for Your Honor’s consideration of these matters.

The Honorable Ona T. Wang  
August 30, 2023

Dated: August 30, 2023  
New York, New York

GUHA PLLC

/s/ Samidh Guha

Samidh Guha (No. 2962199)  
1740 Broadway, 15th Floor  
New York, New York 10019  
Telephone: (212) 399-8330  
Email: sguha@guhapllc.com

*Counsel for Defendants Edward F. Miller,  
USDG, LLC, Michael Piumelli, Giovanna  
Battaglia, Margaret Miller, Segovia  
Construction LLC, Jose Segovia, Samantha  
Bustamante*

cc: All counsel of record (via ECF)

Application **APPROVED**. The Status  
Conference scheduled for  
**Wednesday, September 6, 2023**, is  
adjourned to **Wednesday,  
September 20, 2023 at 3 p.m.** in  
Courtroom 20D, 500 Pearl Street,  
New York, NY 10007.

**SO ORDERED.**



---

Ona T. Wang 8/31/2023  
U.S.M.J.